

**IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

Zackary Ellis Sanders,
Defendant-Appellant,
v.
United States of America,
Plaintiff-Appellee,

No. 22-4242
(1:20-cr-00143-TSE)

**CONSENT MOTION FOR A ONE-WEEK EXTENSION
OF THE BRIEFING SCHEDULE**

Pursuant to Federal Rule of Appellate Procedure 26(b) and Local Rule 31(c), Appellant Zackary Ellis Sanders respectfully moves for a one-week extension of the briefing schedule. Specifically, Appellant requests that the deadline for his opening brief and the joint appendix be extended to June 16, 2022 (from June 9, 2022) and the deadline for the government's response brief be extended to July 7, 2022 (from June 30, 2022). This is Appellant's first request for an extension. In support of the motion, Appellant states:

1. Appellant's counsel has been diligently working to prepare the opening brief in accordance with the initial briefing order, Dkt. 8. However, to date, Appellant has not been able to review a draft of the brief or arrange a call with counsel to discuss the brief. Given what Appellant's counsel has been told regarding staff scheduling at FCI Butner, where Appellant is currently incarcerated, it is likely that,

under the current briefing schedule, Appellant will not have sufficient time to discuss the draft brief with counsel and for counsel to incorporate Appellant's comments. The modified schedule accommodates the difficulties of connecting with Appellant at FCI Butner and safeguards Appellant's Sixth Amendment rights.

2. Counsel for the government has advised that the government consents to the requested extension.

3. The requested extension will not prejudice any party.

CONCLUSION

For the foregoing reasons, Appellant respectfully requests that the Court grant a one-week extension to the briefing schedule, thereby extending the deadline for the joint appendix and opening brief to June 16, 2022, and the deadline for the response brief until July 7, 2022.

Dated: June 1, 2022

Respectfully submitted,

/s/ Lawrence S. Robbins

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CERTIFICATE OF COMPLIANCE

In accordance with Fed. R. App. P. 32(g)(1), I certify that this motion complies with the type-volume limit of Fed. R. App. P. 27(d)(2) because this motion contains 274 words, excluding the parts of the motion exempted by Fed. R. App. P. 32(f).

This motion complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because this document has been prepared in a proportionally spaced typeface using Microsoft Word 2016, Times New Roman, 14-point font.

/s/ Brandon L. Arnold

Brandon L. Arnold

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Fourth Circuit by using the appellate CM/ECF system on June 1, 2022. All participants in the case are registered CM/ECF users and service will be accomplished by the appellate CM/ECF system.

/s/ Brandon L. Arnold

Brandon L. Arnold